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March 2, 2020

VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Petróleos de Venezuela, et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF
(S.D.N.Y.)

Dear Judge Failla:

After continued discussions, and with the benefit of additional clarity concerning the availability of fact witnesses for depositions, we write on behalf of all parties to request that the Court approve the following schedule, which would involve a one-week extension of the summary judgment argument date (subject, of course, to the Court's availability):

March 11, 2020: End of fact depositions
March 16, 2020: Initial expert reports
April 1, 2020: Expert rebuttal reports
April 10, 2020: Conclusion of expert depositions
April 22, 2020: Motions for summary judgment
May 12, 2020: Oppositions to summary judgment motions
May 21, 2020: Replies to summary judgment motions
May 28, 2020 (or another date set by the Court): Hearing on summary judgment motion

The parties' forbearance agreement would be commensurately extended.

We respectfully request that the Court approve the modified schedule and are available to address any questions the Court may have.

Respectfully,



James R. Bliss
of PAUL HASTINGS LLP

cc: Counsel of record